

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Minnesota Chamber of Commerce, *a*
Minnesota nonprofit corporation,

Plaintiff,

vs.

John Choi, *in his official capacity as*
County Attorney for Ramsey County,
Minnesota; George Soule, *in his official*
capacity as Chair of the Minnesota
Campaign Finance and Public Disclosure
Board; David Asp, *in his official capacity*
as Vice Chair of the Minnesota Campaign
Finance and Public Disclosure Board;
Carol Flynn, *in her official capacity as*
Member of the Minnesota Campaign
Finance and Public Disclosure Board;
Margaret Leppik, *in her official capacity*
as Member of the Minnesota Campaign
Finance and Public Disclosure Board;
Stephen Swanson, *in his official capacity*
as Member of the Minnesota Campaign
Finance and Public Disclosure Board; and
Faris Rashid, *in his official capacity as*
Member of the Minnesota Campaign
Finance and Public Disclosure Board,

Defendants

Case No.: 23-CV-02015 (ECT/JFD)

**PLAINTIFF’S MOTION FOR
LEAVE TO SUPPLEMENT THE
SUMMARY JUDGMENT
RECORD**

Plaintiff Minnesota Chamber of Commerce (the “Chamber”) moves the Court for leave to supplement the summary judgment record. The Chamber’s motion is based upon the pleadings, files, records, and proceedings herein, and the Chamber’s Memorandum of

Law and supporting Declarations, filed pursuant to the applicable Federal Rules of Civil Procedure and District of Minnesota Local Rules.

Respectfully submitted,

Dated: October 1, 2024

WINTHROP & WEINSTINE, P.A.

/s/ Cianna G. Halloran

Thomas H. Boyd, #0200517

Tammera R. Diehm, #0327566

Kyle R. Kroll, #0398433

Jordan E. Mogensen, #0400919

Cianna G. Halloran, #0402841

225 South Sixth Street

Suite 3500

Minneapolis, Minnesota 55402

(612) 604-6400

tboyd@winthrop.com

tdiehm@winthrop.com

kkroll@winthrop.com

jmogensen@winthrop.com

challoran@winthrop.com

*Attorneys for Plaintiff Minnesota
Chamber of Commerce*

29859391v1